



Environmental Remediation Group

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SENT VIA ELECTRONIC MAIL

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Ms. Melanie Morash
U. S. Environmental Protection Agency (USEPA), Region 1
5 Post Office Square, Suite 100,
Mail Stop OSRR07-4, Boston, MA 02109-3912

**RE: Proposal to Append the Ongoing Quarterly Monitoring Program
Olin Chemical Superfund Site (OCSS; "Site") – Wilmington, MA**

Dear Ms. Morash:

This letter proposes to add monitoring locations to the ongoing quarterly groundwater and surface water monitoring program and appends analytes for better coverage of areas of concern and to better define the dense aqueous phase liquid (DAPL) extent. The proposed adjustments are based on: recently obtained quarterly groundwater monitoring data; USEPA email dated January 14, 2020; and October 2019 and February 2020 discussions between USEPA and Olin. This letter also provides an update on the ongoing efforts to obtain access for the routinely monitored wells as well as for the data gaps work plan (DGWP) implementation.

Proposed Additional Groundwater Monitoring Locations

Olin proposes to add the following wells to the ongoing quarterly groundwater monitoring program:

- GW-17D, GW-29S/D, GW-45D, GW-52D, GW-70D, GW-79S¹, GW-403D, and GW-416D (Figure 1). Samples from these wells will be analyzed for analytes identified in USEPA's letter dated November 15, 2018.
- B-03, GW-3S, GW-4, GW-13, GW-14, GW-17S, GW-52S, GW-101, PZ-17RR¹, and PZ18R (Figure 1). These are shallow monitoring wells and piezometers located along the East and South Ditch. Olin proposes to monitor these wells on a quarterly basis to better understand the quality of groundwater that is potentially entering East and South Ditch. Samples from these wells will be analyzed for aluminum, ammonia, Bis (2-Ethylhexyl) phthalate (BEHP), hexavalent and total chromium, iron, N-nitrosodimethylamine (NDMA), sulfate, trimethylpentenes (TMPs) and volatile petroleum hydrocarbons (VPH). Note, other shallow wells in the area,

¹ As agreed during the February 26, 2020 discussions, wells with most historical NDMA data (GW-79S and PZ-17RR) are included in the program. PZ-16RR and GW-78S has limited NDMA data and are not included in the program.

GW-50S and GW-307, are part of the current quarterly monitoring program and will continue to be monitored.

- Well GW-43DR, located between the Main Street and Jewell Drive DAPL pools, will be sampled semi-annually in 2020. Samples from GW-43DR will be analyzed for analytes identified in USEPA's letter dated November 15, 2018. The need to sample this well in 2021 will be reassessed based on 2020 and historical sampling results.
- Wells GW-46D, GW-67D, GW-67S, and MP-4 (port #8) will be sampled once during the first quarter 2020 monitoring event. Samples from these wells will be analyzed for analytes identified in USEPA's letter dated November 15, 2018. The need to continue sampling these wells will be reassessed based on the 2020 and historical sampling results.

Note, wells in Maple Meadow Brook (MMB) area (Figure 1), including MW-204M, are included in the quarterly groundwater sampling program. However, as discussed and agreed during the call on February 26, 2020, wells in the MMB area will be sampled on a reduced frequency based on accessibility. As such, the MMB area wells could not be sampled during the third and fourth quarter 2019 sampling event because of unsafe conditions. Olin is currently evaluating safe and viable means to access the MMB area. The wells will be sampled after identifying safe means to access the MMB area.

Proposed Surface Water Monitoring Locations

A total of seven surface water samples (Figure 1) will be collected quarterly from East and South Ditch. Surface water sampling locations include existing monitoring locations, ISCO 2 and ISCO 3, which are part of the semi-annual status monitoring, plus two additional locations along East Ditch and three locations along South Ditch. The proposed locations are contingent upon access. Samples collected from these locations will be analyzed for aluminum, ammonia, BEHP, hexavalent and total chromium, iron, NDMA, sulfate, TMPs, VPH, and other analytes that are monitored as part of the semi-annual status monitoring for surface water.

Specific Gravity Analysis from Select Wells

Based on the discussions with USEPA on October 2 and 3, 2019, samples from the following wells are being analyzed for specific gravity: GW-35D, GW-44D, GW-45D, GW-62D/BR/BRD, GW-70D, GW-83D,² and GW-202BRS. In addition, samples from the following multiport wells are also being analyzed for specific gravity: MP-1 (ports 1, 3, and 4), MP-2 (ports 1, 3, 4, and 6), MP-3 (ports 1, 2, 3, 4, 5, and 6), MP-4 (ports 2, 3, 5, 10, and 11), and MP-5 (ports 1, 2, 3, 6, 8, and 11)¹. Specific gravity data will help to evaluate and refine the DAPL extent.

² Well is in the MMB area. Olin is evaluating safe and viable means to access the MMB area. The well will be sampled after identifying safe access to the MMB area.

Access Agreements

- GW-413D – This well could not be sampled during the third and fourth quarter 2019 sampling events as the property ownership has changed. Olin has initiated the process to execute a new agreement to access and conduct groundwater sampling at this location. This well will be sampled after an access agreement has been executed with the new property owner.
- GW-58S/D and MP-4 – This well was sampled during the third and fourth quarter 2019 sampling events, but the property ownership has changed since the last event. Olin has initiated the process to execute an agreement with the new property owner to access and conduct groundwater sampling at these locations. These wells will be sampled after an access agreement has been executed with the new property owner.
- GW-74D: This well was paved over by City of Woburn and is no longer accessible. As this well is part of the quarterly groundwater sampling program, Olin will contact City of Woburn to request access to install a replacement well during the implementation of the DGWP.
- Olin is continuing to identify relevant private properties for access to implement the Data Gaps Investigation. The list of properties where access is required will be refined and finalized upon approval of the previously agreed phased approach of the Data Gaps Investigation.

As discussed during the February 26th call, Olin will continually assess data from the quarterly sampling and will propose to optimize sample locations and sampling frequency based on relevant data.

Please respond to this letter with your concurrence or let us know if you have any questions.

Sincerely,
OLIN CORPORATION



James M. Cashwell
Director, Environmental Remediation

Enclosure

cc: Chinny Esakkipperumal (Olin)
Libby Bowen (Wood)

